

**UNITED STATES COURT OF APPEALS  
FOR THE THIRD CIRCUIT**

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**NATIONAL LABOR RELATIONS BOARD**  
**Petitioner,**

**v.**

**No. 18-3010**

**ALARIS HEALTH AT ROCHELLE PARK,**  
**Respondent.**

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**DECLARATION OF KATHERINE H. HANSEN IN SUPPORT OF MOTION  
FOR LEAVE TO INTERVENE**

I, Katherine H. Hansen, an attorney duly admitted to practice before the United States Court of Appeals for the Third Circuit under penalty of perjury, declare that the following statements are true and correct:

1. I am a partner at the firm of Gladstein, Reif & Meginniss, LLP, counsel to 1199 SEIU United Healthcare Workers East (“1199 SEIU” or “the Union”). I was admitted to practice before the United States Court of Appeals for the Third Circuit in 2014 and am a member in good standing. I submit this declaration in support of 1199 SEIU’s motion for leave to intervene in this matter in which Petitioner National Labor Relations Board (“NLRB” or “Petitioner”) seeks enforcement of its Decision and Order issued against Respondent Alaris Health at Rochelle Park (“Respondent”) on May 10, 2018, in Board Case No. 22-CA-194401, reported at 366 NLRB No. 86.
2. In that Decision and Order, Petitioner found that Respondent violated Sections 8(a)(1) and (5) of the National Labor Relations Act (“the Act”) by unilaterally

eliminating the holiday payout option and ordered Respondent to, *inter alia*, rescind this unilateral change and make all affected employees whole.

3. 1199 SEIU, a labor organization, was the charging party in the underlying NLRB proceeding and participated in the NLRB proceeding.

4. The NLRB's Decision and Order directly affects the Union, as the Union is the exclusive collective bargaining representative of Respondent's non-professional employees.

5. I am fully familiar with the facts and issues presented in this matter, as this firm participated on behalf of the Union in the underlying unfair labor practice proceeding.

6. The Union moves to intervene in support of the NLRB's Decision and Order.

Dated: New York, New York  
September 27, 2018

/s/ Katherine H. Hansen  
Katherine H. Hansen

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